

**IN THE UNITED STATES OF DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN DOE,

Plaintiff,

vs.

Civil Case No.: 1:20-CV-0402-SDG

BOARD OF REGENTS OF THE
UNIVERSITY SYSTEM OF
GEORGIA, UNIVERSITY OF
GEORGIA,

JERE WADE MOREHEAD,
INDIVIDUALLY AND AS
PRESIDENT UNIVERSITY OF
GEORGIA, UNIVERSITY OF
GEORGIA EQUAL OPPORTUNITY
OFFICE, ERYN JANYCE DAWKINS,
INDIVIDUALLY AND AS
DIRECTOR EQUAL OPPORTUNITY
OFFICE, UNIVERSITY OF

GEORGIA, UNIVERSITY OF
GEORGIA ATHLETIC
ASSOCIATION, INC., EDWARD
MCMILLIAN TATE,
INDIVIDUALLY AND AS VICE
CHANCELLOR OF LEGAL
AFFAIRS, UNIVERSITY OF
GEORGIA AND C. DEAN ALFORD,
P.E., INDIVIDUALLY AND AS
MEMBER OF BOARD OF REGENTS
OF THE UNIVERSITY SYSTEM OF
GEORGIA.

Defendants.

AFFIDAVIT OF ANDREW LOGAN LAWRENCE

State of Georgia

County of Fulton

Personally, appeared before the undersigned, an officer authorized by law to administer oaths, ANDREW LOGAN LAWRENCE, who, after being first duly sworn on oath, and deposed states:

1. I am over the age of 18 and am competent to make this affidavit.

2. The following are facts, to which I would testify were I in court, which is made a part of this affidavit. Such facts stated herein are true and accurate, to the best of my knowledge and belief.
3. I am not suffering under any mental disability and am competent to give this affidavit.
4. I can read, write, and give this affidavit voluntarily and on my own free will and accord. No one has used any threats, force, pressure, or intimidation to make me sign this affidavit. I make this affidavit in support of the truth.
5. I base this Affidavit upon my own personal knowledge.
6. Throughout the Fall 2018 semester, I met with the University of Georgia Equal Opportunity Office (hereinafter 'EOO') on three (3) separate occasions in order to provide their office with information related to an altercation that took place in the Miller Learning Center between myself and UGA Philosophy student teacher, Irami Osei-Frimpong.
7. Mr. Osei-Frimpong was invited to speak at a general body meeting of the UGA Young Democrats on September 12, 2018, and I attended as student journalist, who wished to ask Mr. Osei-Frimpong about a number of statements he had made about white students on various social networking sites, including, but not limited to, comparing white students to children living with autism, calling them white supremacists, and Chick-fil-A workers.
8. During the question-and-answer portion of the meeting, which was videoed, Mr. Osei-Frimpong stated that white people were "sociopaths," and told me to "shut my yap" when I attempted to ask for clarification on

his statements. He then went on to indicate that “it was a strategy to pretend that all white people were individuals.” The degree to which I was humiliated by Mr. Osei-Frimpong and the nearly fifty (50) student attendees for simply being white is immeasurable.

9. On September 14, 2018, Mr. Osei-Frimpong took to the UGA Young Democrats Facebook page, where he publicly stated that my urge to ask questions was a “tick,” that I was “culturally deficient,” and that I should apologize because I was “sucking up so much air in the room.” He continued to teach courses throughout this time.
10. On September 19, 2018, Kieran Morrow, Associate Director of the EOO, who had caught wind of the altercation, contacted me via phone to schedule a time to meet and discuss the events that had transpired. Following the call, I provided her with a video of the altercation, via e-mail. I met with Miss Morrow on Wednesday, September 26, 2018. During this meeting, I provided her with a detailed account of the events that transpired. I was unable, at this time, to share the video of Mr. Osei-Frimpong’s lecture, due to the file size, and was told that I could not file a formal complaint until she viewed the video of Mr. Osei-Frimpong’s lecture.
11. After unsuccessful attempts to provide the EOO with video of Mr. Osei-Frimpong’s lecture through e-mail or flash drive, I again met with Miss Morrow in October 2018, the specific date of which, I am uncertain, as the meeting was scheduled over the phone. During this meeting, Miss Morrow watched the video of Mr. Osei-Frimpong’s lecture, on my phone, and transcribed 2-3 pages of Mr. Osei-Frimpong’s comments. I

also pointed Miss Morrow in the direction of Mr. Osei-Frimpong's RateMyProfessor.com page, which displays two student reviews from earlier in 2018, where students indicated that Mr. Osei-Frimpong had discriminated against them for being white. One student wrote that Mr. Osei-Frimpong told her that, since she was a member of a sorority, she was "bound to end up hooked on Xanax and living in Peachtree City." Miss Morrow claimed that she could not accept these reviews and informed me that based upon what she had seen in the video of Mr. Osei-Frimpong's lecture, and the video of our altercation, I would not be allowed to file a formal complaint.

12. Following a November 21, 2018 article that I penned for my previous employer, *Campus Reform.org*, which highlighted Mr. Osei-Frimpong's suspension from Facebook for his comments, I again met with Miss Morrow, presenting her with a number of written statements published by Mr. Osei-Frimpong, which continually criticized white students. Again, the EOO denied my request to file a complaint against Mr. Osei-Frimpong, and I was told that the EOO would investigate his student course reviews at the end of the semester. This was the last time that I heard from the EOO.

This 18 day of February 2021.

Further affiant sayeth not.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

ANDREW LOGAN LAWRENCE

State: Georgia

County: Fulton

Sworn to and subscribed before me this 18 day of February, 2021 by:

 Personally Known

 X Produced Identification

Type and # of ID GADL057145282

Vaidehi Patel
Printed Name of Notary
Notary Public, State of Georgia

Vain Patel
SIGNATURE OF NOTARY

